

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re:

Antoine Lazern Johnson AKA  
Antoine L. Johnson, Jr.

Debtor.

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:  
: Case No.: 21-13338  
: Chapter 7  
: Judge Carol A. Doyle  
: \* \* \* \* \*  
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**NOTICE OF MOTION**

TO: See attached list.

PLEASE TAKE NOTICE that on May 5, 2022, at 10:00 a.m., I will appear before the Honorable Judge Carol A. Doyle, or any judge sitting in that judge's place, and present a Motion for Relief from Stay, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 161 155 8289 and the password is Doyle742. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

KeyBank National Association

By: /s/ Todd J. Ruchman  
Todd J. Ruchman (6271827)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus OH 43216-5028  
Contact email is [tjruchman@manleydeas.com](mailto:tjruchman@manleydeas.com)

**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Notice of Motion was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Frances Gecker, fgecker@fgllp.com

John H Redfield, Attorney for Antoine Lazern Johnson AKA Antoine L. Johnson, Jr.,  
jredfield@cranesimon.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Antoine Lazern Johnson AKA Antoine L. Johnson, Jr., 16501 Evergreen Dr., Tinley Park, IL  
60477

/s/ Todd J. Ruchman

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**In re:**

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: **Case No.: 21-13338**  
: **Chapter 7**  
: **Judge Carol A. Doyle**  
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**MOTION OF KEYBANK NATIONAL ASSOCIATION FOR RELIEF FROM THE  
AUTOMATIC STAY (FIRST MORTGAGE)**

KeyBank National Association ("Creditor"), by and through the undersigned counsel, moves the Court pursuant to 11 U.S.C. § 362(d) for an Order granting relief from the automatic stay on the real property located at 16501 Evergreen Drive, Tinley Park, IL 60477 ("Property").

In support of its motion, Creditor states the following:

1. Antoine Lazern Johnson AKA Antoine L. Johnson, Jr. ("Debtor") filed a petition for relief under Chapter 7 of the Bankruptcy Code on November 23, 2021 (the "Petition Date").
2. On May 19, 2020, Debtor executed a Note in the original amount of \$337,750.00 (the "Note"). A copy of the Note is attached hereto as Exhibit A.
3. To secure the Note, a Mortgage was given May 19, 2020 and recorded July 7, 2020. A copy of the Mortgage is attached as Exhibit B, evidencing perfection of Creditor's security interest in the Property which is more particularly described in the Mortgage.
4. There are no other liens against the property as listed in Debtor's Schedule D.

5. As of March 2, 2022 the total outstanding amount due on the Note is \$359,903.38 which consists of:

Principal	\$334,396.35
Interest	\$14,877.63
Escrow advance	\$10,162.00
Late charges	\$235.20
Other Fees	\$232.20
Suspense funds	\$(0.00)

6. Creditor seeks relief from the automatic stay pursuant to 11 USC § 362(d) to proceed under applicable non-bankruptcy law to enforce its remedies to repossess and sell the Property.
7. Creditor is entitled to relief from the automatic stay for the following reason(s):
- Creditor is not adequately protected per 11 USC § 362(d)(1) based upon Debtor's contractual default.
  - Debtor is in default in performance of the terms and conditions of the Note and Mortgage and is contractually due for the January 2021 payment in the amount of \$2,465.18. Debtor's default totals \$40,858.46. This amount is broken down as follows:

<b><u>Payments Delinquent to Creditor</u></b>		
<b>Date Range</b>	<b>Amount</b>	<b>Total</b>
January 2021 to June 2021	\$2,608.59	\$15,651.54
July 2021 to December 2021	\$2,557.70	\$15,346.20
January 2022 to April 2022	\$2,465.18	\$9,860.72
Total: \$40,858.46		

8. Creditor hereby waives the right under 11 U.S.C. § 362(e) to a hearing on this motion within 30 days of the date it is filed. Creditor further requests that Rule 4001(a)(3) be waived so that an Order Granting Relief from the Automatic Stay will take immediate effect.

WHEREFORE, Creditor prays for the entry of the attached Order Granting Relief from the Automatic Stay.

Respectfully submitted,

/s/ Todd J. Ruchman

Todd J. Ruchman (6271827)

Keith Levy (6279243)

Adam B. Hall (0088234)

Edward H. Cahill (0088985)

Stephen R. Franks (0075345)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Todd J. Ruchman.

Contact email is

tjruchman@manleydeas.com

**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Motion of KeyBank National Association for Relief from the Automatic Stay (First Mortgage) was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Frances Gecker, fgecker@fgllp.com

John H Redfield, Attorney for Antoine Lazern Johnson AKA Antoine L. Johnson, Jr.,  
jredfield@cranesimon.com

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/s/ Todd J. Ruchman

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